

Exhibit A

Proposed Order

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

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<i>In re</i>	: :
THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,	: PROMESA : Title III
as representative of	: :
THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> ,	: Case No. 17-BK-3283 (LTS) : (Jointly Administered)
Debtors. ¹	: : :
	----- X -----
<i>In re</i>	: : :
THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,	: PROMESA : Title III
as representative of	: :
PUERTO RICO ELECTRICAL POWER AUTHORITY (PREPA),	: Case No. 17-BK-04780-LTS : Court Filing Relates Only to PREPA
Debtor.	: :
	----- X -----

**[PROPOSED] ORDER GRANTING URGENT MOTION OF SOLUS TO FILE
UNDER SEAL UNREDACTED MOTION TO COMPEL TESTIMONY
PURSUANT TO RULE 30(b)(6) FROM U.S. BANK IN CONNECTION WITH
PREPA RSA SETTLEMENT MOTION**

¹ The Debtors in these title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747).

Upon consideration of the *Urgent Motion of Solus to File Under Seal Unredacted Motion to Compel Testimony Pursuant to Rule 30(b)(6) from U.S. Bank in Connection with PREPA RSA Settlement Motion* (the “Motion to Seal”), filed on July 16, 2019, and it appearing that (i) the Court has jurisdiction to consider the Motion to Seal and the relief requested therein pursuant to section 310 of the Puerto Rico Oversight, Management and Economic Stability Act (“PROMESA”); (ii) venue of this proceeding and the Motion to Seal is proper pursuant to section 307 of PROMESA; (iii) notice of the Motion to Seal was adequate and proper under the circumstances and no further or other notice need be given; and (iv) based on the statements made in the Motion to Seal, the Court finds that it is appropriate for Solus to file under seal an unredacted version of the *Motion of Solus to Compel Testimony Pursuant to Rule 30(b)(6) from U.S. Bank in Connection with PREPA RSA Settlement Motion* [Docket No. 1469] (the “Motion”) and Exhibit C attached thereto,

IT IS HEREBY ORDERED THAT:

1. The Motion to Seal is GRANTED.
2. Solus is entitled to file a full and unredacted version of the Motion and the attached Exhibit C under seal.
3. The Clerk of Court will provide Solus and all other parties entitled to service in these proceedings access to the sealed materials through their counsel of record.
4. This Order is without prejudice to the rights of any party in interest to seek to unseal the documents or any part thereof.

Dated _____, 2019

Honorable Judith G. Dein
United States Magistrate Judge